

Kevin Allen Gibbs

(Enter Above the Name of the Plaintiff in this Action)

VS.

Missy Leigh Howell

(Enter above the name of the Defendant in this Action)

If there are additional Defendants, please list them:

Steven Maxnard

Zachary Shust

Aaron J. Adkins

Richard K. Jones

1:19CV196 11

J. BARRETT

MJ. LITKOVITZ

RECEIVED

COMPLAINT

MAR 13 2019

I. Parties to the action:

RICHARD W. NAGEL
Clerk, Of Court
CINCINNATI, OHIO

Plaintiff: Place your name and address on the lines below. The address you give must be the address where the court may contact you and mail documents to you. A telephone number is required.

Kevin Allen Gibbs

Name - Full Name Please - PRINT

3189 Princeton Road PMB 196

Street Address

Hamilton, Ohio 45011

City, State and Zip Code

419-549-4138

Telephone Number

If there are additional Plaintiffs in this suit, a separate piece of paper should be attached immediately behind this page with their full names, addresses and telephone numbers. If there are no other Plaintiffs, continue with this form.

Defendant(s):

Place the name and address of each Defendant you listed in the caption on the first page of this Complaint. This form is invalid unless each Defendant appears with full address for proper service.

1. MISSY Leigh Howell
Name - Full Name Please
15 North Timber Hollow Drive APT 1522 Fairfield, Ohio 45014
Address: Street, City, State and Zip Code
2. Steven Maynard
5230 Pleasant Ave. Fairfield, Ohio ~~45014~~ 45014
3. Zachary Shust
5230 Pleasant Ave Fairfield, Ohio 45014
4. Aaron James Atkins
One Donham Plaza Middletown, Ohio 45042
5. Richard K. Jones
705 Hanover Street Hamilton, Ohio 45011
6. _____

If there are additional Defendants, please list their names and addresses on a separate sheet of paper.

II. Subject Matter Jurisdiction

Check the box or boxes that describes your lawsuit:

- ☒ Title 28 U.S.C. § 1343(3)
[A civil rights lawsuit alleging that Defendant(s) acting under color of State law, deprived you of a right secured by federal law or the Constitution.]
- ☐ Title 28 U.S.C. § 1331
[A lawsuit "arising under the Constitution, laws, or treaties of the United States."]
- ☐ Title 28 U.S.C. § 1332(a)(1)
[A lawsuit between citizens of different states where the matter in controversy exceeds \$75,000.]
- ☐ Title _____ United States Code, Section _____
[Other federal status giving the court subject matter jurisdiction.]

III. Statement of Claim

Please write as briefly as possible the facts of your case. Describe how each Defendant is involved. Include the name of all persons involved, give dates and places.

Number each claim separately. Use as much space as you need. You are not limited to the papers we give you. Attach extra sheets that deal with your statement claim immediately behind this piece of paper.

See next page...

1. Missy Leigh Howell called the cops on me on 06/20/18. She was fully aware that I was a person with a disability & required a service dog. She called the cops due to the dog's whining which results from separation anxiety which cannot be safely cured or treated to the best of my knowledge up to this point. She told me she assumed I was beating the dog. which is false, I never laid an unloving hand on the dog, even though she is a service animal, I consider her a part of my family.

2. Steven Maynard is the Fairfield Police chief & superior to co-defendant Officer Zachary Shust. American Staffordshire Terriers are banned in the city of Fairfield. An exception was not made as per the Americans with Disabilities Act of 1990.

3. Officer Zachary Shust is one of the officers under the direction of co-defendant Steven Maynard. American Staffordshire Terriers are banned in the city of Fairfield. An exception was not made as per the Americans with Disabilities Act of 1990.

4. Richard K Jones is the sheriff of Butler county in which the city of Fairfield is located. Furthermore, was the supervisor of former Butler county deputy dog warden Aaron James Adkins at the time of the incident on 06/20/18.

5. Aaron James Adkins was a deputy dog warden for the city of Fairfield & was under the direction of co-defendant Richard K Jones at the time of the incident on 06/20/18. Furthermore, Mr. Adkins violated the American's with Disabilities Act of 1990 in regard to a request he made to me to prove the dog was a service dog by providing documentation, which I refused to do as the American's with Disabilities Act does not require service dog owners to prove disability or certification of any kind in regard to the dog's status as a service dog. A claim which can be backed up by Sara Gibbs (plaintiff's sister) & Matthew Corell (plaintiff's sister's boyfriend), as they were party to the conversation.

The Fairfield Police Department is also in violation of Ohio's wiretapping laws due to its handling of an arrest for a bench warrant related to plaintiff's inability to attend the original court hearing on the matter due to being in the hospital on July 3rd & 4th. Upon release from the hospital, I promptly faxed the doctor's note keeping me on bedrest until July 15th 2018 & the pertinent American's with Disabilities Act statutes to the Fairfield Municipal court. I was told the judge was ready to proceed on July 3rd & never received them. I was charged with harboring a pitt bull & failure to appear. The failure to appear was dropped & I was found guilty of charge of & fined \$250.

IV. Previous lawsuits:

If you have been a Plaintiff in a lawsuit, for each lawsuit state the case number and caption.
(Example, Case Number: 2:08-cv-728 and Caption: John Smith vs. Jane Doe).

Case Number

Caption

<u>N/A</u>	_____	vs. _____
_____	_____	vs. _____
_____	_____	vs. _____

V. Relief

In this section please state (write) briefly exactly what you want the court to do for you. Make no legal argument, cite no case or statutes.

see next page

I state under penalty of perjury that the foregoing is true and correct. Executed on

this 2nd day of March, 2019.

Rebecca G. Galt

Signature of Plaintiff

1. ANY outstanding balance on Bella's bill in the Hospitality Inn in Leesburg, Ohio paid in full, so that she may come home to me.

2. Psyche support services paid for by either the county or city or any combination thereof in full for trauma & mental anguish suffered.

3. The Butler County Sheriff's office & all employees are to obtain & complete training in regard to dealing with service animals, the laws concerning them & their owner's regardless of military service or medical disability due to non-military service as well as update its training repertoire regularly. The parameters which constitute regularity shall be determined by this court and the sheriff's office shall abide by this court's ruling in its entirety.

4. 3. The Fairfield Police Department & all employees are to obtain & complete training in regard to dealing with service animals, the laws concerning them & their owner's regardless of military service or medical disability due to non-military service as well as update its training repertoire regularly. The parameters which constitute regularity shall be determined by this court and the police department shall abide by this court's ruling in its entirety.

5. A protection order against Missy Leigh Howell for the entirety of her natural life & anger management. Court shall take note I TRIED to be a good neighbor.

6. A face to face apology from each defendant naming what they have done to me individually televised by Fox19 & lead by Fox19 reporter Amber Jayanth (the reporter who originally broke the story of my plight.)

7. \$300,000 in compensatory damages.

8. \$250,000 from each defendant in punitive damages.

9. Criminal charges specifically the harboring a pit bull & failure to appear removed 100% from my jacket.